The above amendment and these remarks are responsive to the communication from Examiner S. Pannala dated 26 Sep 2002.

Claims 1-22 are in the case, none having been allowed.

Drawings

Applicants submit herewith a Letter to the Drawing Review Branch with formal drawings (24 sheets) for entry to the case upon the approval of the Examiner.

Specification

The Examiner has correctly objected to applicants use of certain trademarks.

Applicants have amended the specification to properly cite these trademarks, and has also corrected the specification to refer to copending applications by serial number and remove the corresponding references to assignee docket numbers.

35 U.S.C. 102

Claims 1-2 and 4-22 have been rejected under 35 U.S.C. 102(e) as being anticipated by McGee (US Patent 6,393,8). Applicants assume the Examiner intended to cite U.S. Patent 6,393,468.

Applicants traverse, and argue that the Examiner has not made the required prima facie case of anticipation, which requires that the Examiner provides

1. a single reference

2. that teaches or enables

3. each of the claimed elements (arranged as in the claim)

4. expressly or inherently

5. as interpreted by one of ordinary skill in the art.

With respect to the third element, it is not enough that the prior art reference disclose all the claimed elements in isolation. Rather, as stated by the Federal Circuit, the prior art reference must disclose each element of the

claimed invention "arranged as in the claim." The Examiner,

further, must identify the elements of the claims of the

application, determine their meaning in light of the

specification and prosecution history, and identify the

corresponding elements disclosed in the allegedly

anticipating reference. [See Lindermann Maschinenfabrik

GmbH v. American Hoist & Derrick Co., 221 USPQ 481, 485

(Fed. Cir. 1984)]. Further, anticipation will not be found

when the prior art is lacking or missing a specific feature

or structure of the claimed invention. [See Continental Can

Co. USA v. Monsanto Co., 20 USPQ 2d 1746, 1748 (Fed. Cir.

1991)].

The McGee reference is about how a web server enforces

logins and then uses those logins for optimizing its

caching.

The Examiner references several sections in McGee

which, as applicants characterize them, teach the following:

Col. 7:65-67   storage of authorization validation

                information to enforce login access.

Col. 8:4-16   server authorization using stored validation

information.

Col. 8:16-37	login session, one example authorization sequence, timeouts, user profile information contained in server directory, ways of storing login-validation information (e.g. encrypted pwd files).
Col. 8:38-48	session caching, live context information kept in cache on server to avoid redundant regeneration.
Col. 9:10-21	server index of cached sessions, along with garbage collection of inactive sessions.
Col. 9:23-39	a token compression approach to URLs that employs user session IDs to support an additional per-user webpage cache.
Col. 9:40-49	an exemption to the compression so webpages that are common to all users are handled normally.
Col. 10:12-18	web login process to be authorized.

Col. 10:12-43   token generation from a successful

authorization and general use in replace

compression of a URL.

Col. 10:63-11:12   an example algorithm for authorization

and setting up of a session.

Col. 11:45-67   a specific unique token generation algorithm

from URL, user identity, and random number

generator.

Col. 11:56-12:29   probability of uniqueness on a token,

token use with session cache, and

compression replacement of URLs in a

webpage when processing it for web page

cache.

Col. 12:17-29   lookup of possible precached web pages,

matching to tokens for future lookup of pages

from shared web page cache.

Col. 12:58-63   lookup of user page generation defaults from

a database.

While the McGee reference relates to how a web server enforces logins and then uses those logins for optimizing its caching, applicants invention relates to a remote security model. These are completely different. For example, there is nothing in a McGee's web server authorization system that requires it to actually contain the information which a user supplies to log in -- it only need have the information needed to validate the login. Public key logins, as in McGee, are exactly about protecting a user's password and private key from having to be stored on a server. The server can compare a temporarily provided copy of that information to a public key base, authorize access and not hold onto the password or private key beyond that point. Servers that store passwords put all those passwords at risk if hacked.

Thus, a primary distinction between applicants' invention and McGee's database of authorization-validation information is that applicant's login-credentials (DOLS password store) supports end-user utilities that log in on behalf of a user. Applicants' system creates and securely distributes and stores private keys and passwords into an encrypted personal end-user store, and does that in a way that lets end-user programs log in on the user's behalf

securely and non-repudiatively to many different servers,

servers that have no knowledge of each other or trust

relationship to each other. And this is done without

compromising the passwords of the user if his machine is

stolen.

Referring to the claims, each of claims 1-13 and 21

recites a "subscription" in the body of the claim and claims

14-19, 20 and 22 relate to issuing user identifiers for

subscriptions, with the user identifier limitation being

within the body of the claim and as such, drawing in the

subscription concept as a claim limitation. Applicants

define "subscription" at page 24, lines 11-17 as follows:

> "A subscription is... a secured (that is, ACL
>
> protected) database or collection of databases
>
> containing off-line web applications with
>
> synchronization schedules and with which an authorized
>
> user may interact, either on-line or with an off-line
>
> instantiation."

There is no teaching in McGee of a "subscription", as

applicants have defined the term.

Applicants urge that claims 1-2 and 4-22 be allowed over McGee.

35 U.S.C. 103

Claim 3 has been rejected under 35 U.S.C. 103(a) over McGee (again, applicants assume this is U.S. Patent 6,393,468) in view of Forbes et al. (U. S. Patent 6,381,742).

Applicants traverse, and argue that the Examiner has not established a prima facie case of obviousness, which requires that the Examiner provides

1.   one or more references

2.   that were available to the inventor and

3.   that teach

4.   a suggestion to combine or modify the references,

5.   the combination or modification of which would appear to be sufficient to have made the claimed invention obvious to one of ordinary skill in the art.

The fourth element of the prima facie case, the suggestion to combine, must come from the prior art. It is insufficient to establish obviousness that the separate elements of the invention existed in the prior art, absent some teaching or suggestion, in the prior art, to combine the elements. [See Arkie Lures, Inc. v. Gene Larew Tackle, Inc., 43 USPQ 2d 1294 (Fed. Cir. 1997)]. That a claimed invention may employ known principles does not itself establish that the invention would have been obvious, particularly where those principles are employed to deal with different problems. [See Lindermann, supra.] The Examiner must consider the claim as a whole, and not piece together the claimed invention using the claims as a guide. The Federal Circuit has stated: "[o]ne cannot use hindsight reconstruction to pick and choose among isolated disclosures in the prior art to deprecate the claimed invention. [See In re Fritch, 23 USPQ 2d 1780, 1784 (Fed. Cir. 1992)].

The McGee reference is about how a web server enforces logins and then uses those logins for optimizing its caching. The Forbes references is about incremental installers of application logic using XML.

Applicants have previously explained the distinction to

be drawn between claim 3 (which depends from claim 2) and McGee.

With respect to Forbes, Forbes teaches at Col. 12:29-14:3 a manifest for incremental installation of application logic onto a machine using XML and namespaces. There is no teaching of a "subscription" as that term has been defined by applicants and discussed previously with respect to McGee.

Applicants urge that claim 3 also be allowed.

SUMMARY AND CONCLUSION

Attached hereto is a marked-up version of the changes made to the specification and claims by the current amendment. The attachment is captioned **"Version with markings to show changes made."**

Applicants urge that the above amendments be entered and the case passed to issue with claims 1-22.

If, in the opinion of the Examiner, a telephone

conversation with applicant(s) attorney could possibly

facilitate prosecution of the case, he may be reached at the

number noted below.

Sincerely,

C. J. Kraenzel, et al.

By

Shelley M Beckstrand
Reg. No. 24,886

Date: 23 Dec 2002

Shelley M Beckstrand, P.C.
Attorney at Law
314 Main Street
Owego, NY 13827

Phone: (607) 687-9913
Fax: (607) 687-7848

VERSION WITH MARKINGS TO SHOW CHANGES MADE

In the Specification

Paragraph beginning at page 1 line 5 has been amended as follows:

-- The following U.S. patent applications filed concurrently herewith are assigned to the same assignee hereof, contain subject matter related, in certain respect, to the subject matter of the present application and are incorporated herein by reference:

U.S. Patent application S/N [__ filed __] 09/596,283 filed 19 June 2000 for "System and Method for Providing a Distributable Runtime" [, assignee docket number LOT9 2000 0005];

U.S. Patent application S/N [__ filed __] 09/596,282 filed 19 June 2000 for "System and Method for Downloading Security Context Elements Governing Execution of Downloadable and Distributable Agents" [, assignee docket number LOT9 2000 0012];

U.S. Patent application S/N [__ filed __] 09/596,963 filed 19 June 2000 for "System and Method for Selective Replication of Databases Within a Workflow, Enterprise, and Mail-Enabled Web Application Server and Platform" [, assignee docket number LOT9 2000 0004];

U.S. Patent application S/N [__ filed __] 09/597,997 filed 19 June 2000 for "System and Method For Providing a Distributable Runtime That Deploys Web Applications and Services From a Workflow, Enterprise, and Mail-Enabled Web Application Server and Platform" [, assignee docket number LOT9 2000 0003];

U.S. Patent application S/N [__ filed __] 09/596,745 filed 19 June 2000 for "A System and Method for a Web Based Trust Model Governing Delivery of Services and Programs" [, assignee docket number LOT9 2000 0011]; and

U.S. Patent application S/N [__ filed __] 09/596,845 filed 16 June 2000 for "A System and Method for Developing and Administering Web Applications and Services From a Workflow, Enterprise, and Mail-Enabled Web Application Server and Platform[, assignee docket number LOT9 2000 0010].--.

Paragraph beginning at page 3 line 4 has been amended as follows:

-- The Lotus Development Corporation Domino (TM) server is an enhancement to Notes to add web capabilities. Thus, Domino is a workflow enterprise and mail enabled web application server and platform. There is a need in the art to enhance the Domino server and platform to allow distributed computing and remote execution of Domino web applications.--.

Paragraph beginning at page 3 line 10 has been amended as follows:

-- The Lotus Development Corporation QuickPlace (TM) server is an enhancement to Domino. It is a workflow, enterprise and mail-enabled web application server and environment for rapid creation of collaborative user communities. There is a need in the art to enhance this server and platform to allow distributed computing and remote execution of QuickPlace applications.--.

Paragraph beginning at page 3 line 15 has been amended as

follows:

-- ' The Microsoft Exchange (TM) server is a mail enabled
application server and platform. This does not support
workflow, nor scale easily to an enterprise level.
Novel's GroupWise (TM) server is a workflow enabled
enterprise server and platform. This does not support mail,
nor scale easily to an enterprise level. There is a need in
the art for a mail and workflow web application server and
environment which supports mail and scales easily and well
to the enterprise level, which requires that all software
elements need to scale to very large applications with
respect to performance, loading, and administration tools.--

.

Paragraph beginning at page 5 line 4 has been amended as
follows:

-- In the QuickPlace server there exists a mechanism by
which *Notes* ID's are auto-generated on the server and
shipped down across the communication link to a client
during the client set-up time. There was one and only one
way to get the [*Notes*] Notes ID that is necessary for use
during replication processes.--.

Paragraph beginning at page 15 line 2 has been amended as follows:

--   Referring to Figure 1, Domino (TM) <u>server</u> 60 is an enhancement to Notes to add web capabilities. Thus, Domino <u>server</u> 60 is a workflow enterprise and mail-enabled web application server and platform configured with respect to Notes in support of mobile Notes client 64 and Notes client 68. In the Lotus Notes file system, the Domino web server 60 is viewed as a super folder.

Paragraph beginning at page 15 line 9 has been amended as follows:

--   <u>Lotus</u> QuickPlace (TM) <u>server</u> (not shown) is also an enhancement to <u>the</u> Domino <u>server</u>. It is a workflow enterprise and mail-enabled web application server and environment for rapid creation of collaborative user communities. <u>The</u> QuickPlace <u>server</u> is described in copending U.S. patent application, [assignee docket LO999053] <u>S/N 09/477,473 filed 4 January 2000 for System and Method for Client Replication of Collaboration Space</u>, and in several copending applications referenced therein.--.

Paragraph beginning at page 15 line 15 has been amended as follows:

-- Domino Online Services (DOLS) 62 provides an enhancement to the Domino server and platform 60 to allow distributed computing and remote execution by iNotes client 66 of Domino web applications and distributed computing and remote execution of the QuickPlace <u>server</u> applications.--.

Paragraph beginning at page 45 line 20 has been amended as follows:

-- <u>The</u> QuickPlace <u>server</u> didn't have a user interface (UI) for synchronization. This invention provides an iNotes synchronization manager, a utility having a tool bar with lists of subscriptions, including provision for server log in, scheduled replication, and access to data bases. This enables a plurality of replications to run simultaneously. The advantages of simultaneous operations is increased performance in certain situations, and it is required if different ID's are allowed to run at different schedules. Thus, it is much more than the replicator tab on Notes.

Paragraph beginning at page 101 line 3 has been amended as

follows:

--   A QuickPlace server could generate IDs on the fly.
This invention provides for auto-issue of IDs from a Notes
database, or the like, together with reuse of previously
deployed IDs. New server tools are provided for ID
generation, including tools for auto generation, table
lookup, and user prompt.--.

Paragraph beginning at page 62 line 20 has been amended as
follows:

--   In accordance with the preferred embodiment of the
invention, Domino Off-Line Services (DOLS) provides a way
for browser users to utilize Domino Web applications
offline. Using a browser, the user takes an application
offline, makes changes, and synchronizes those changes with
the online application. Notes software, available from
Lotus Development Corporation, works with Domino
applications to provide a distributed client/server database
application to let users organize, process, track, and use
information to suit their individual needs. Notes/Domino
servers consolidate the tools needed to effectively
communicate and collaborate in an organization by providing,

inter alia, email, group discussion, workflow, scheduling,
document management and many other functions. Domino
databases are built on three basic concepts: documents,
views and forms. Documents are collections of data items
which can be retrieved as a set. Views are the ways of
accessing the indices or summaries of documents stored in a
database while forms are templates for accessing and
displaying documents.--.

Paragraph beginning at page 107 line 16 has been amended as
follows:

-- Following 308 processing, the user is asked via
download control element 234 if download processing
represented by line 307 is to proceed. Line 307 represents
the download transmission channel, which involves processing
of an ID context from Domino server API (DSAPI) ID generator
108 through download control plug in or ActiveX 146 to the
corresponding download page 230 element 234. Channel 307
inherits from channel 308 the same security context: that
is, its secure or insecure nature. The ID context provided
by DSAPI ID extension 108 is in accordance with one of three
policies, or forms: (1) an ID can be generated on server
104; (2)an ID can be determined from a database store 111 on

server 100; an ID can be requested from the user. In cases 1 and 2, an ID is shipped down as represented by channel 307. In case 3, the user will be prompted for a file previously received outside this system. A common used other manner is an already in use mechanism for <u>a</u> Notes <u>application</u>/Domino <u>server</u> as a platform 100, by way of which administrators create IDs and get them to users in some other secure manner.--.